

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

Susie Reed,

Civil No.: _____

Plaintiff,

vs.

NOTICE OF REMOVAL

Rent Recovery Solutions, LLC,

Defendant.

TO: THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MINNESOTA, and

PLAINTIFF ABOVE-NAMED, and Her Attorney, John H. Goolsby, Goolsby
Law Office, LLC, 475 Cleveland Avenue North, Suite 212, St. Paul, MN 55104.

PLEASE TAKE NOTICE that Defendant Rent Recovery Solutions, LLC hereby
removes the State Court action described below to this Court pursuant to 28 U.S.C. §§
1331, 1367 and 1441, *et seq.* and respectfully states as follows:

1. Plaintiff commenced the removed action on or about June 22, 2017 in the
Hennepin County District Court, State of Minnesota. It is entitled *Susie Reed v. Rent
Recovery Solutions, LLC*, Court File No. 27-cv-17-9827, and is now pending in said
Court. A true and correct copy of Plaintiff's Summons and Complaint is attached hereto
as Exhibit A. No further proceedings have been had therein. This Notice of Removal is,
therefore, timely filed within the 30-day period prescribed by 28 U.S.C. § 1446(b).

2. This action may be removed from the Hennepin County District Court, in
the State of Minnesota, pursuant to 28 U.S.C. §§ 1441 and 1331 (federal question

jurisdiction), because the District of Minnesota is the District embracing the place where the action is pending.

3. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, because the action constitutes a claim by Plaintiff against Defendant for violation of a federal statute, Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692, *et seq.*

4. Contemporaneous with this filing, Defendant is serving notice of the filing of this Removal on Plaintiff’s counsel. A Notice of Filing of Removal of action to Federal Court is also being filed in the Hennepin County District Court.

WHEREFORE, Defendant removes this action from the Hennepin County District Court in the State of Minnesota, and respectfully requests any further relief, general or specific, at law or in equity, to which it may be justly entitled.

BASSFORD REMELE
A Professional Association

Dated: July 21, 2017

By s/ Christopher R. Morris
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